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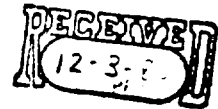
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*Andrew*  
*Cifer*

November 14, 1985

HHF:278:85

Ms. Beverly E. Houston  
Remedial Project Manager  
Emergency and Remedial Response Branch  
U. S. Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, GA 30365



Dear Ms. Houston:

I wish to thank you for sending us a copy of the draft RIF study report on Lee's Lane Landfill. We appreciate having been given the opportunity to review the document and submit our comments. As a potentially responsible party, we are interested in the development of an appropriate remedial program.

In the short time available to us, we did not study and review all the engineering studies and economic evaluations. We are therefore restricting our comments to our general view of the remedial alternatives.

We support the alternative discussed in 10.3(2), surface waste area cleanup, bank protection controls, gas collection and venting systems, optional alternate water supply and monitoring, as adequately addressing all current and potential future concerns. Our position is based on the following.

The health risk assessment shows no evidence of current public health concerns. Potential future public health concerns involve off-site leachate generation and gas release. Onsite concerns involve gas release and presence of "hot spots" (Table 8-10).

The alternative in 10.3(2) addresses all these issues in an effective manner. Installation of gas collection and venting system provides control of air pollution concerns. Removal of surface wastes and contamination soils provides a cost effective method by applying remedial action on an "as needed" basis. Continued ground water monitoring provides assurance that original assumptions are valid and that off-site ground water contamination does not occur. As the study points out, because of the proximity of the Ohio River, the hydraulic gradient towards the river and the large river flow relative to possible leachate flow, any leaching from the site should not present a health or environmental problem. The bank stabilization further minimizes river quality deterioration.



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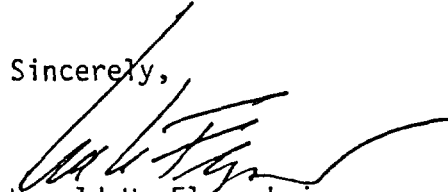
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This alternative differs from "the alternative which meets all applicable standards" only by the fact that capping, regrading and revegetation is excluded. We take the position that because of the topography and hydrology of the site and its location near the Ohio River, coupled with minimal evidence of leaching toxics from this site, the supported alternative is equivalent to one which meets all applicable standards.

Furthermore, the disruption that would be caused to neighboring residents, flora and fauna in the site area during the years required for implementation of alternatives calling for capping or removal cannot be justified on the basis of additional benefits gained.

Please keep up advised on the progress of any activities relating to this site.

Sincerely,



Harold H. Flegenheimer  
Manager  
Environmental, Health and Safety Affairs

dmh